

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

SUZETTE JONES *
1822 Buckingham Drive *
Pasadena, Texas 77504 *

Plaintiff, *

vs. *

BWI HOTEL HOLDINGS I, LLC, T/A * Case No.
COMFORT INN & SUITES BWI-AIRPORT
1901 Fort Myer Drive *
Arlington, Virginia 22209 *

SERVE ON:

CSC-Lawyers Incorporating Service *
7 St. Paul Street *
Suite 820 *
Baltimore, Maryland 21202 *

Defendant.

* * * * *

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, Suzette Jones, by undersigned counsel, hereby files this Complaint against BWI Hotel Holdings I, LLC, t/a Comfort Inn & Suites BWI-Airport, Defendant herein, and alleges as follows:

I. JURISDICTION AND VENUE

1. Plaintiff invokes the jurisdiction of this Court pursuant 28 U.S.C. § 1332.
2. Venue is proper in this Court pursuant to 28 U.S.C. § 1331(a).

3. The amount in controversy herein exceeds the sum of \$75,000.00, exclusive of interest and costs.

II. PARTIES

4. Suzette Jones ("Jones") is a citizen of the State of Texas with a residence at 1822 Buckingham Drive, Pasadena, Texas 77504. At all times relevant to this Complaint, Jones resided in the State of Maryland with a residence in Prince George's County at 14625 Baltimore Avenue, Laurel, Maryland 20707.

5. BWI Hotel Holdings I, LLC, t/a Comfort Inn & Suites BWI-Airport ("BHH") is a company based in the State of Delaware with its principal place of business located at 1901 Fort Myer Drive, Suite 1012, Arlington, Virginia 22209. At all times relevant to this Complaint, BHH was in exclusive possession of the Comfort Inn & Suites BWI Airport located at the property known as 6921 Baltimore Annapolis Boulevard, Baltimore, Maryland 21225.

III. FACTS

6. On or about January 14, 2020, Jones and her husband, Anthony Jones, booked a handicap accessible room at the Comfort Inn & Suites BWI Airport located at the property known as 6921 Baltimore Annapolis Boulevard, Baltimore, Maryland 21225 ("Premises").

7. On or about January 14, 2020, Jones entered the bathtub located in her room. After taking her bath, Jones

grabbed onto the hand railing located in the shower stall and attempted to exit the tub. While exiting the tub, the hand railing became detached from the wall causing Jones to lose her balance and fall to the ground causing her to sustain profound and painful injuries to her legs, neck, back, and body. As a result of the injuries sustained, Jones was forced to incur substantial medical bills. As of the date of the filing of this Complaint, Jones is still experiencing periodic pain and discomfort as result of the injuries she sustained as a result of her fall on January 14, 2020 and may be in need of future medical care.

8. At all times prior to her fall, Jones maintained a proper and vigilant outlook as she attempted to exit the bathtub and her actions in no way contributed to her fall. To the contrary, Jones' injuries were solely the result of the unreasonable acts and omissions of BHH.

9. Prior to this accident, BHH had knowledge and notice that: (1) the handrail that became detached from the shower stall was in a state of disrepair and constituted a hazardous condition. Notwithstanding said knowledge and notice, BHH failed to take reasonable actions to prevent and/or cure the hazardous condition which it knew or should have known could result in injuries to its patrons. Additionally, BHH failed to provide any sort of meaningful warning to Jones, or others lawfully on the

premises, of the dangerous condition which existed at the time of the incident.

COUNT I
(Negligence)

10. Plaintiff hereby incorporates by reference the allegations contained in paragraphs 1-9.

11. BHH, at all times material to this Complaint, was in exclusive, possession, custody and control of the Comfort Inn & Suites BWI Airport located at the property known as 6921 Baltimore Annapolis Boulevard, Baltimore, Maryland 21225. As such, BHH owed a duty to Jones, and all patrons who were lawfully on the premises, to ensure the Premises was free from dangerous conditions which could cause patrons and their guests to sustain injury. BHH also had a duty to warn Jones, and all other invitees lawfully present, of any defects, dangers, or other hazardous conditions which existed on the Premises.

12. On or about January 14, 2020, BHH breached the duties of care it owed to Jones by failing to (1) divert her from the area of bathroom where the incident occurred; (2) take reasonable actions to ensure that the handrail located in the shower stall was properly secured to the wall; and/or (3) warn Jones, and all other patrons lawfully on the Premises, of the aforementioned dangerous conditions of which it knew or should have known existed as of the time of Jones' accident.

Jones, and all other patrons lawfully on the Premises, of the aforementioned dangerous conditions of which it knew or should have known existed as of the time of Jones' accident.

13. As a result of BHH's breaches of the duties of care owed to Jones, Jones sustained substantial damages.

WHEREFORE, Plaintiff, Suzette Jones, prays that the Court enter judgment in her favor and against Defendant, BWI Hotel Holdings I, LLC, t/a Comfort Inn & Suites BWI-Airport, for compensatory damages exceeding the amount of \$75,000.00, with the exact amount to be determined at trial, plus pre-judgment interest, costs, and such other and further relief as justice may require.

Respectfully submitted,

[Handwritten signature]
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Matthew T. Holley (Fed Bar No. 19001)
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(410) 832-8800

Attorneys for Plaintiff,
Suzette Jones

JURY TRIAL DEMANDED

Plaintiff hereby demands and request that all claims, actions and causes of action set forth herein be tried before a jury.



Matthew T. Holley